

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

DIANA BONACASA, VINCENT BONACASA,  
RAQUEL BONACASA, BARBARA  
ROSENDAHL, JEFFREY MUNCY, GILBERT  
RUSSELL, ABIGAIL RUSSELL, SARAH  
RUSSELL, NOEMI RUSSELL, BENJAMIN  
RUSSELL, NATHANAEL RUSSELL, DEBBIE  
WILLIAMS, and CHELSEA MANGANO

Plaintiffs,

-against-

STANDARD CHARTERED PLC and STANDARD  
CHARTERED BANK

Defendants.

Case No. 1:22-cv-03320

**[PROPOSED] STIPULATED ORDER**

Subject to the approval of the Court, Plaintiffs Diana Bonacasa, Vincent Bonacasa, Raquel Bonacasa, Barbara Rosendahl, Jeffrey Muncy, Gilbert Russell, Abigail Russell, Sarah Russell, Noemi Russell, Benjamin Russell, Nathanael Russell, Debbie Williams, and Chelsea Mangano (collectively, “Plaintiffs”) and Defendants Standard Chartered PLC and Standard Chartered Bank (collectively, “Defendants”), through their undersigned attorneys, stipulate and agree as follows:

WHEREAS, on April 22, 2022, a complaint was filed claiming violations of federal law and captioned, *Diana Bonacasa et al. v. Standard Chartered plc et al.*, Case No. 1:22-cv-03320 (S.D.N.Y.);

WHEREAS, Defendants have not been served with process;

WHEREAS, undersigned counsel for Defendants, who are authorized to accept service, hereby accept service of the summons and Complaint in the above-captioned action on their clients’ behalf, without prejudice to and without waiver of any of Defendants’ defenses,

objections, or arguments in this matter or any other matter, including but not limited to any objections to jurisdiction or venue, except as to sufficiency of service of process;

WHEREAS, an answer to the Complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure is due in this matter within twenty one (21) days of service of process of the Complaint and summons, *see* Fed. R. Civ. P. 12(a) and (b);

WHEREAS, no party has previously requested or received an extension of time to answer or otherwise plead to the Complaint in the above-captioned action.

IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, by and between the undersigned counsel for Plaintiffs and Defendants, that:

1. The time for Defendants to move, answer, or otherwise respond to the complaint is extended until June 13, 2022.

2. To the extent Defendants file a letter seeking a pre-motion conference in connection with a proposed motion to dismiss under Rule 2(A) of the Court's Individual Practices, Plaintiffs shall have five (5) business days to respond to Defendants' letter.

3. Each Defendant expressly reserves all rights, defenses, and other objections other than insufficient process or insufficient service of process.

**AGREED:**

By: /s/ Andrew Lichtman

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*Attorneys for Defendants*

**SO ORDERED:**

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